

REMARKS

Claims 1-12 are currently pending in the present application, of which Claims 1, 4-5 and 8-12 have been amended.

Support for the claim amendments can be found in paragraphs 0026 and 0027 of the specification.

Rejection under 35 U.S.C. § 101

Claim 9 was rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Applicants respectfully traverse such rejection insofar as it might apply to the claims as amended herein.

Amended Claim 9 now recites a "computer usable medium having a computer program product for performing..." Since a computer usable medium is considered as patentable subject matter, the § 101 rejection is believed to be overcome.

Rejection under 35 U.S.C. § 112

Claim 9 was rejected under 35 U.S.C. § 112, first paragraph, for not complying with the enablement requirement. Applicants respectfully traverse such rejection insofar as it might apply to the claims as amended herein.

As stated above, amended Claim 9 now recites a "computer usable medium having a computer program product for performing...", and support for such amendment can be found in paragraph 0029 of the specification. Thus, the § 112 rejection is believed to be overcome.

Rejection under 35 U.S.C. § 102

Claims 1-2, 4-6, 8-10 and 12 were rejected under 35 U.S.C. § 102(b) as being anticipated by *Rostoker et al.* (US 5,557,531). Applicants respectfully traverse such rejection insofar as it might apply to the claims as amended herein.

Amended Claim 1 (and similarly Claims 5 and 9) now recites a step of "determining whether or not a simulation is required for said I/O circuit before performing I/O floor planning on said I/O circuit." If a simulation is required, then the collected design data is sent to a simulation interface. Within the simulation interface, an I/O behavioral model and a package model are chosen "based on said collected design data on said I/O circuit," a simulation deck is dynamically builded "using said chosen models along with appropriate operating conditions." A simulation is then performed using the "simulation deck containing said chosen I/O behavioral model and said operating conditions." Finally, I/O floor planning is performed on "said I/O circuit based on said received simulation results."

Thus, according to the claimed invention, a simulation interface sends the design data to a simulator at which a simulation is performed, and the simulation results are sent back to the simulation interface. An I/O floor planning is subsequently performed for the I/O circuit based on the received simulation results. In constrast, *Rostoker* does not teach or suggest the above-mentioned claimed steps. Because the invention recites to novel features that are taught or suggested by *Rostoker*, thus, § 102 rejection is believed to be overcome.

CONCLUSION

Claims 1-12 are currently pending in the present application. For the reasons stated above, Applicants believe that independent Claims 1, 5 and 9 along with their respective dependent claims are in condition for allowance. The remaining prior art cited by the Examiner but not relied upon has been reviewed and is not believed to show or suggest the claimed invention.

No fee or extension of time is believed to be necessary; however, in the event that any addition fee or extension of time is required for the prosecution of the present application, please charge it against IBM Deposit Account No. 09-0456.

Respectfully submitted,



Antony P. Ng
Registration No. 43,427
DILLON & YUDELL, LLP
8911 N. Capital of Texas Hwy., suite 2110
Austin, Texas 78759
(512) 343-6116

ATTORNEY FOR APPLICANTS